

akerman

Jeffrey Kimmel

May 9, 2022

VIA ECF

Honorable Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl St., Room 18A
New York, NY 10007

The parties' request for a stay pending their arbitration (ECF No. 15) is GRANTED. The parties shall file a joint letter on the status of their arbitration by **June 24, 2022 or within one week of their arbitration**, whichever is sooner.

The clerk of Court is respectfully directed to close ECF No. 15.

SO ORDERED 5/11/2022


SARAH L. CAVE
United States Magistrate Judge

RE: Eunice Raquel Flores Thomas, et al., v. AAM Holding Corp. et al.
Case No. 22-cv-3110

Dear Judge Woods:

This firm represents AAM Holding Corp. d/b/a Flashdancers Gentlemen's Club, 59 Murray Street Enterprises, Inc. d/b/a Flashdancers Gentlemen's Club, Barry Lipsitz, and Barry Lipsitz, Jr., ("Defendants") in the above-referenced matter. Defendants and Plaintiff Eunice Raquel Flores Thomas ("Plaintiff") have filed a stipulation to stay the proceedings in this matter pending arbitration. Pursuant to Rule 1(F) of Your Honor's Individual Rules of Practice in Civil Cases, the parties respectfully submit this joint letter with the parties' stipulation to stay the proceedings.

Upon the filing of the Complaint in the above-captioned action, *See* Dkt. 1, counsel for Defendants informed Plaintiff's counsel that Plaintiff entered into arbitration agreements pursuant to which she agreed to individually arbitrate all of the claims asserted in the Complaint. Thus, the parties have agreed to stay this action pending arbitration. A stay of proceedings is appropriate where all of the claims in an action have been referred to an arbitration, and a stay has been requested, which Plaintiff requests here. *See Katz v. Celco Partnership*, 794 F.3d 341, 347 (2d Cir. 2015).

The parties do not believe there is any other information necessary to provide context for the Court's evaluation of the request at this time. For the foregoing reasons, the parties respectfully request that this Court grant the parties' request, and order a stay of proceedings pending arbitration.

Respectfully Submitted,

AKERMAN LLP

/s/ Jeffrey A. Kimmel
Jeffrey A. Kimmel

cc: Danielle Petretta, Esq. (via ECF)